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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SHEIKH MD TOUHID UL ALAM

(aka "Sheikh Alam"),

Plaintiff,

v.

JEH JOHNSON, Secretary of the

Department of Homeland Security,

LEON RODRIGUEZ, Director of U.S.

Citizenship and Immigration Services,

DONALD NEUFELD, Associate

Director of Service Center Operations,

U.S. Citizenship and Immigration

Services,

Defendants.

) Case No. 3:15-cv-00105 EDL

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**STIPULATION TO EXTEND DATES
and ~~PROPOSED~~ ORDER**

Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. In this case, Plaintiff seeks a writ of mandamus requiring the United States Citizenship and Immigration Services (“USCIS”) to render a decision on his application to register permanent residence or adjust status, USCIS Form I-485.

2. Plaintiff filed this action on January 8, 2015, ECF Doc. 1, and served the United States Attorney for the Northern District of California on January 12, 2015. ECF Doc. 5. Defendants’ answer is currently due on March 13, 2015.

3. On January 9, 2015, this Court entered an Order Setting Initial Case Management Conference and ADR Deadlines. ECF Doc. 4.

4. On February 20, 2015, USCIS issued to Plaintiff a third Request for Evidence (“RFE”) in connection with his I-485 application, asking him to provide to USCIS by May 15, 2015, certain documents and information related to his eligibility for permanent residence.

5. In order to allow USCIS sufficient time to receive and consider the documents and information requested in the February 20, 2015, RFE, and to consider an alternative resolution to this case before the parties or the Court expend additional resources and effort on this litigation, the parties hereby respectfully ask this Court to extend Defendants’ time to answer, or otherwise respond to, the Complaint from Friday, March 13, 2015, until Friday, August 14, 2015.

6. Further, the parties respectfully request that the Court correspondingly extend the dates in the Court’s January 9, 2015, Case Management Conference Order as follows:

a. To August 18, 2015, to meet and confer concerning initial disclosures and the other matters identified in the Court’s January 9th Order as due by March 17, 2015;

b. To September 1, 2015, to file the Rule 26(f) report, and the other matters identified in the Court’s January 9th Order as due by March 31, 2015; and

c. To September 8, 2015, for the initial Case Management Conference, scheduled in the Court’s January 9th Order for April 7, 2015.

IT IS SO STIPULATED.

Date: March 2, 2015

For the Plaintiff,

/s/ Cara Jobson
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Respectfully submitted,

For the Defendants,

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/s/ Edward S. White
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: March 3, 2015


ELIZABETH D. LAPORTE
United States Magistrate Judge